

TECHNICAL EXHIBIT

APPLICATION FOR
FM CONSTRUCTION PERMIT

KDAG (FM)

GULFSTAR COMMUNICATIONS NEW MEXICO LICENSEE, INC.
FARMINGTON, NEW MEXICO

CH 245C 100 KW 307 M HAAT

OTHER STATIONS WITHIN 16 KILOMETERS

AM WITHIN STUDY

Job Title :KDAG UPGRADE AM Within 16.0 km
Sorted by Distance FCC AM DB Date : 02/20/97
Frequencies : 530 kHz to 1700 kHz Coordinates : 36-48-52 107-53-32
Call City State Freq. Hours Power-kW Latitude Bearing Dist.
Status FCC File No. Country Class Mode RMS-mV/m Longitude deg-Tru (km)

KCQL AZTEC NM 1340 Unl 1.000 36-49-17 274.7 9.6
Lic. - US 4 ND1 346.01 107-59-58

** End of AM Within Study **

FM WITHIN 16.0 KILOMETERS STUDY

Job Title :KDAG UPGRADE FCC DB Date : 02/21/97
Minimum Channel 200 (87.9 MHz) Coordinates : 36-48-52 107-53-32
Maximum Channel 300 (107.9 MHz) FM Records Sorted by Distance
Call City Channel ERP(kW) Latitude Bearing Distance
Status State FCC File No. Freq. HAAT(m) Longitude deg-True kilometers

KTRA Farmington 271C 100. 36-48-52 .0 .00
LIC NM BLH910304KB 102.1 303.0 107-53-32

NEW Kirtland 275C 100. 36-48-52 .0 .00
APP NM BPH950525MR 102.9 307.0 107-53-32 SS

NEW-T Cedar Hill 291D .250 36-48-52 .0 .00
APP NM BPFT960726TD 106.1 .0 107-53-32

NEW-T Flora Vista 300D .125 36-48-52 .0 .00
APP NM BPFT960719TG 107.9 .0 107-53-32

TECHNICAL EXHIBIT

OTHER STATIONS WITHIN 16 KILOMETERS

FM WITHIN 16.0 KILOMETERS STUDY

Job Title :KDAG UPGRADE FCC DB Date : 02/21/97
 Minimum Channel 200 (87.9 MHz) Coordinates : 36-48-52 107-53-32
 Maximum Channel 300 (107.9 MHz) FM Records Sorted by Distance

| Call | City | Channel | ERP(kw) | Latitude | Bearing | Distance | |
|--------|-------------|--------------|---------|----------|-----------|---------------------|-------|
| Status | State | FCC File No. | Freq. | HAAT(m) | Longitude | deg-True kilometers | |
| K285AH | Aztec, etc. | 285D | | 36-48-07 | 183.1 | 1.40 | |
| LIC | NM | BLFT251 | 104.9 | .0 | 107-53-35 | | |
| NEW-T | Aztec | 291D | .103 | DA | 36-46-20 | 248.9 | 13.03 |
| APP | NM | BPFT961118TD | 106.1 | 31.0 | 108-01-42 | | |
| NEW-T | Flora Vista | 300D | .08 | DA | 36-46-20 | 248.9 | 13.03 |
| APP | NM | BPFT960212TC | 107.9 | 34.0 | 108-01-42 | | |
| NEW | Bloomfield | 283C | 100. | | 36-46-34 | 254.0 | 15.43 |
| APP | NM | BPH850712RM | 104.5 | 316.0 | 108-03-30 | | |
| NEW | Kirtland | 275C | 100. | | 36-56-30 | 25.8 | 15.71 |
| APP | NM | BPH950525MM | 102.9 | 303.0 | 107-48-55 | | |

** End of FM within study **

TV WITHIN STUDY

Job Title :KDAG UPGRADE TV Within 16.0 km
 Sorted by Distance FCC TV DB Date : 02/21/97
 Channels 2 to 83 Coordinates : 36-48-52 107-53-32

| Call | City | Channel | ERP(kw) | Latitude | Bearing | Dist. | |
|--------|--------------------|----------------|---------|-----------|-----------|---------------|-------|
| Status | State | FCC File No. | Zone | HAAT(m) | Longitude | deg-True (km) | |
| K38DA | AZTEC | 38 | .126 | DA | 36-48-23 | 265.6 | 11.57 |
| LIC | NM | BLTT-911118JK | | 1776 amsl | 108-01-17 | | |
| K08FR | AZTEC | 8 | .038 | DA | 36-46-20 | 248.9 | 13.03 |
| LIC | NM | BLTTV-870512ID | | 1786 amsl | 108-01-42 | | |
| K10CG | AZTEC & CEDAR HILL | 10 | .087 | DA | 36-46-20 | 248.9 | 13.03 |
| LIC | NM | BLTTV-870129IE | | 1786 amsl | 108-01-42 | | |
| K09JJ | BLOOMFIELD, ETC. | 9 | .007 | DA | 36-41-03 | 168.1 | 14.79 |
| LIC | NM | BLTTV-3323 | | 1766 amsl | 107-51-29 | | |
| K11JO | BLOOMFIELD, ETC. | 11 | .004 | DA | 36-41-03 | 168.1 | 14.79 |
| LIC | NM | BLTTV-3325 | | 1762 amsl | 107-51-29 | | |

** End of TV Within Study **

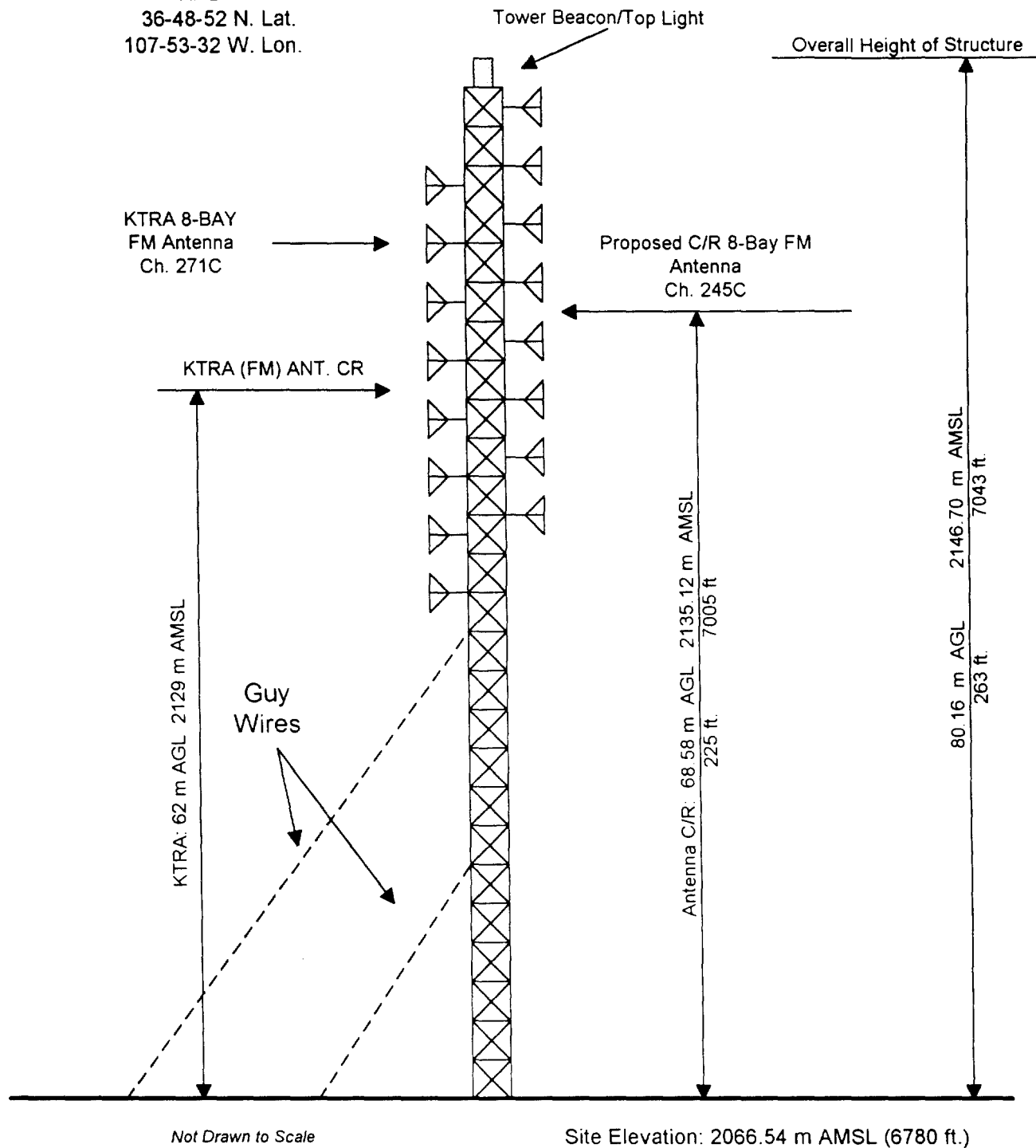
Existing Tower FAA No. 87ASW-0665-OE

Site Coordinates:

NAD27

36-48-52 N. Lat.

107-53-32 W. Lon.



*T.Z. Sawyer Technical
Consultants*

VERTICAL SKETCH OF ANTENNA / TOWER

CHANNEL 245C - KDAG (FM) PROPOSED EXHIBIT E-1
FARMINGTON, NEW MEXICO

CHEVY CHASE, MARYLAND U.S.A

SIZE
A

FSCM NO
N/A

DWG NO

970208E1 KDAG

REV

NONE

(c) 1997, ALL RIGHTS RESERVED

SCALE

N/A

SHEET

1 OF 1

TECHNICAL EXHIBIT
APPLICATION FOR
FM CONSTRUCTION PERMIT

KDAG (FM)

GULFSTAR COMMUNICATIONS NEW MEXICO LICENSEE, INC.
FARMINGTON, NEW MEXICO

CH 245C 100 KW 307 M HAAT

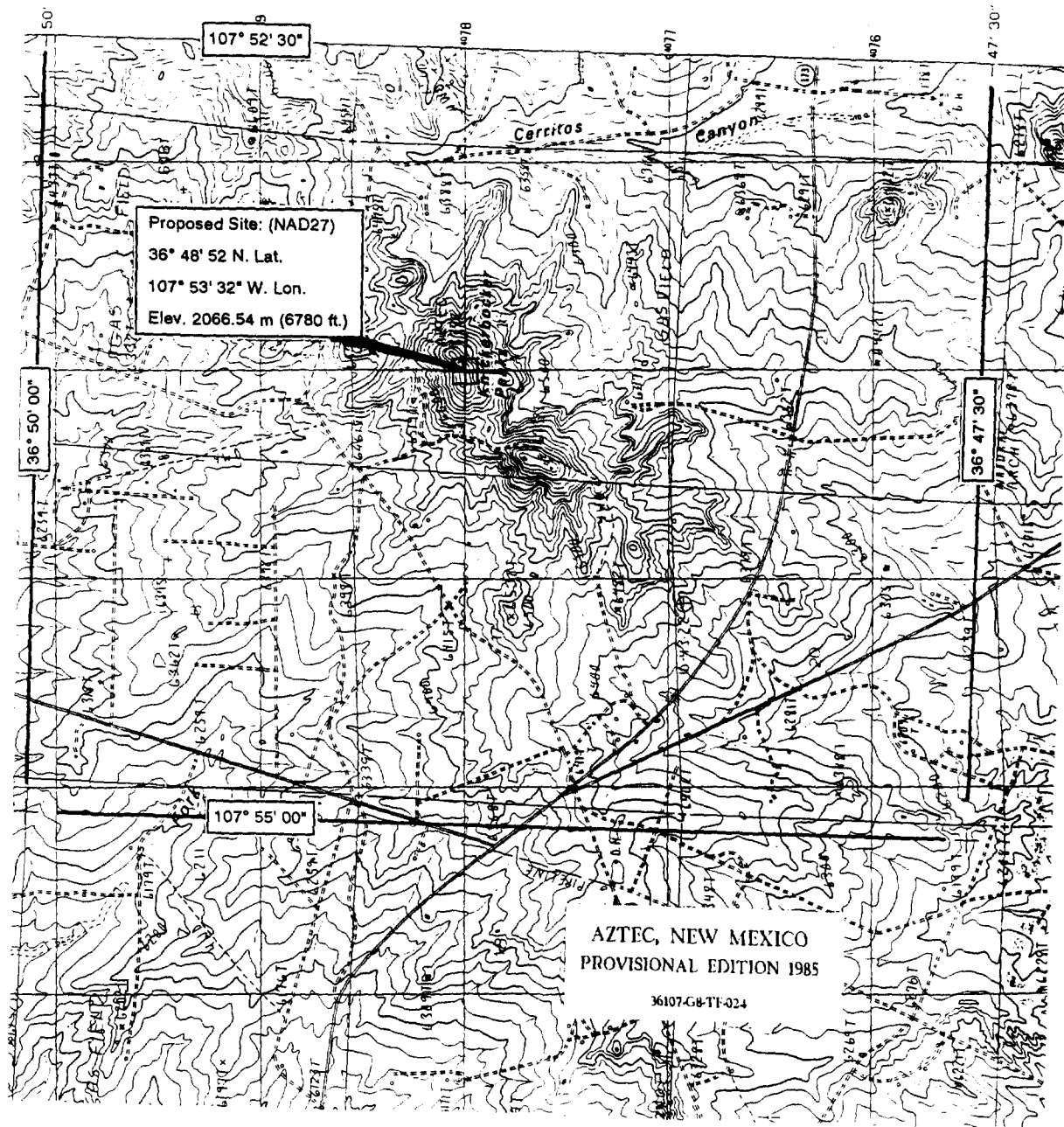
ONE-STEP PROPOSAL

In response to Question 14 of FCC Form 301, Section V-B the following is submitted:

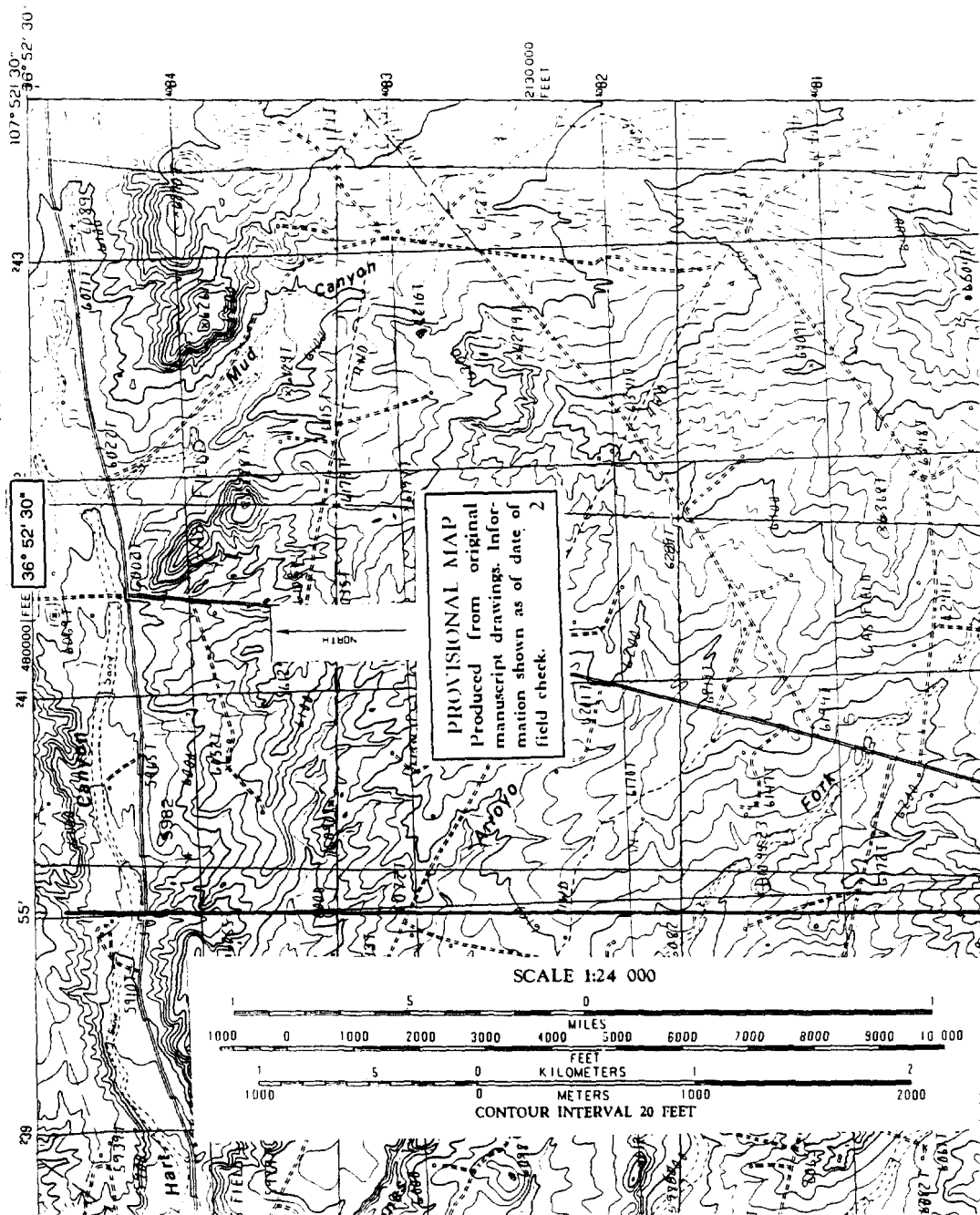
- (1) The allotment site is the application site, and it is an existing tower location. A site map is included herein as Exhibit E-3.
- (2) The proposed allotment site is the same as the application site, therefore, the map included herein as Exhibit E-4 demonstrates compliance with 47 C.F.R. § 73.315
- (3) An FM channel study for the allotment/application site is included herein as Figure 2.
- (4) The allotment site is the application site, and is suitable for tower construction; the existing tower will be used.

Transmitter Site Map

Exhibit E-3



AZTEC QUADRANGLE
 NEW MEXICO-SAN JUAN CO.
 7.5 MINUTE SERIES (TOPOGRAPHIC)



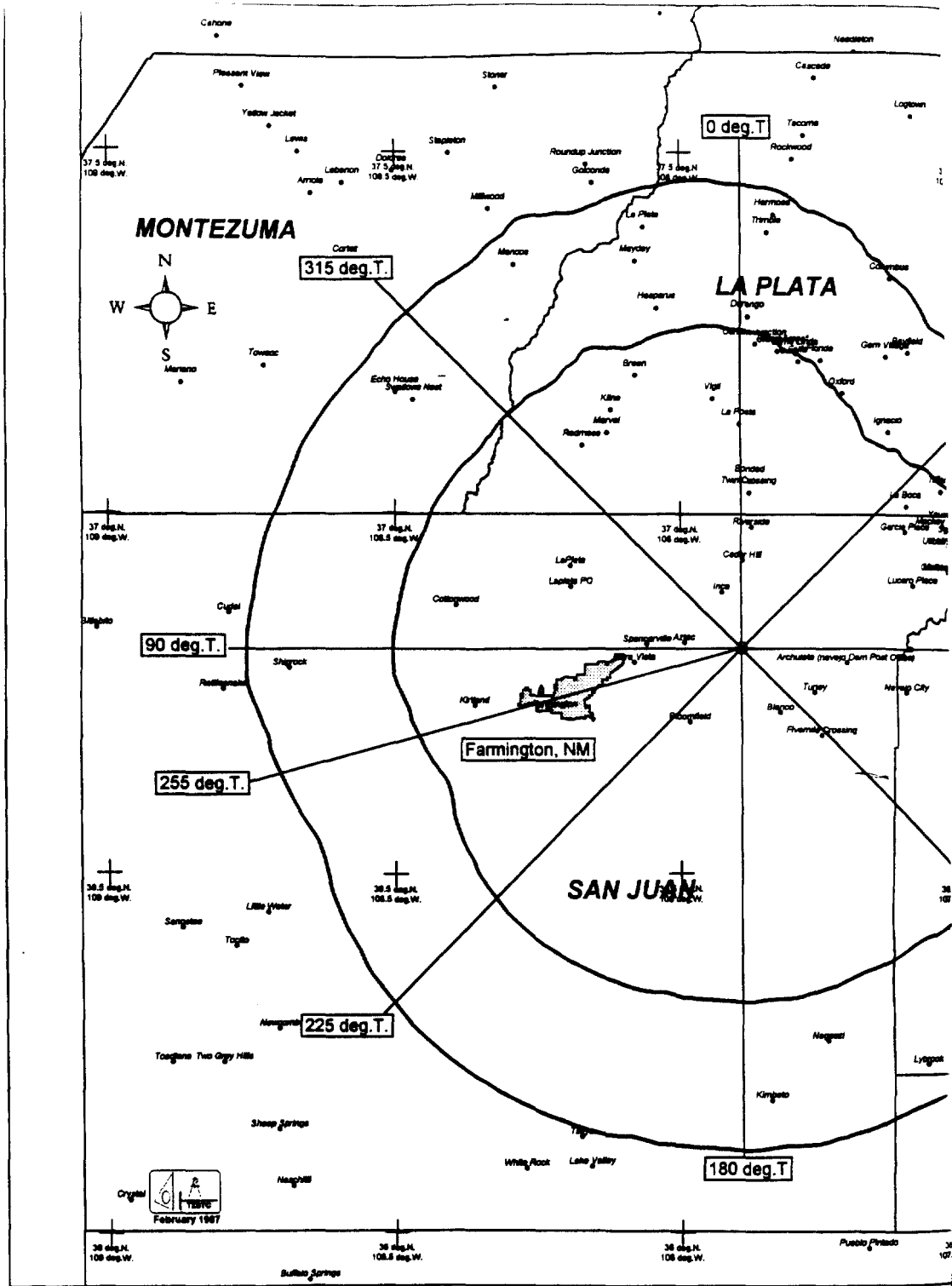
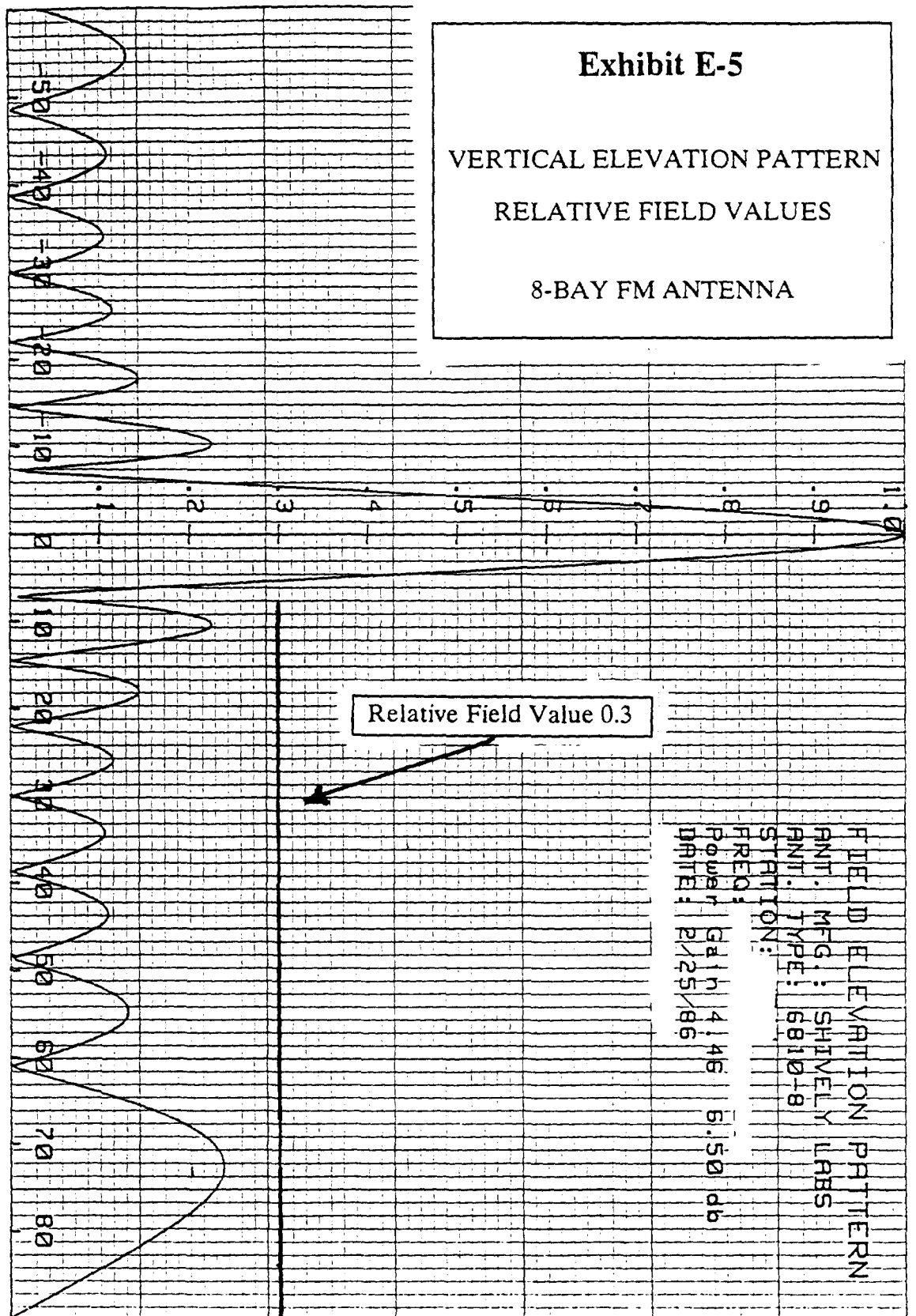


Exhibit E-5

VERTICAL ELEVATION PATTERN

RELATIVE FIELD VALUES

8-BAY FM ANTENNA



GULFSTAR COMMUNICATIONS, INC.
600 CONGRESS AVENUE, SUITE 1410
AUSTIN, TX 78701
512-320-7222

NATIONSBANK OF TEXAS, N.A.
TYLER, TX
32-2/1110

17825

GULFSTAR COMMUNICATIONS, INC.

CHECK DATE

CONTROL
NUMBER

AMOUNT

03/06/97

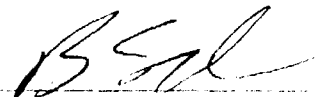
*****2,470.00*

PAY

*TWO THOUSAND FOUR HUNDRED SEVENTY DOLLARS AND NO CENTS

TO THE
ORDER
OF

FEDERAL COMMUNICATIONS
COMMISSION


AUTHORIZED SIGNATURE

SECURITY FEATURES INCLUDED. DETAILS ON BACK.
⑈017825⑈ ⑆111000025⑆ ⑈5890293811⑈

GulfStar Communications New Mexico Licensee, Inc.

EXHIBIT 2

TECHNICAL EXHIBIT
PETITION TO MODIFY
FM TABLE OF ALLOTMENTS

MM DOCKET 97-18
RM-8943

PROPOSED ALTERNATE CHANNEL
CHANNEL 287A

DURANGO, COLORADO

Proponent: Gulfstar Communications New Mexico Licensee, Inc.

Narrative

The technical exhibit of which this narrative is part was prepared on behalf of Gulfstar Communications New Mexico Licensee, Inc., (“Gulfstar”) in support of a counterproposal to modify the FM Table of Allotments (47CFR 73.202) to add FM Channel 243A at Durango, Colorado. Gulfstar proposes as an alternate channel the allocation of Channel 287A at Durango, Colorado.

Channel 243A, if allocated to Durango, Colorado would create a short-space allocation to an application to improve the facilities of FM Station KDAG, Farmington, New Mexico. Gulfstar is the licensee of Station KDAG and in its application for a construction permit, is seeking to upgrade the facilities of KDAG from a Class C1 to a Class C station on FM Channel 245 at Farmington, New Mexico.

The proposed allotment of Channel 243A at Durango would conflict with the proposed upgrade of the KDAG facilities, thus depriving KDAG of the ability to improve its facilities and its service to the surrounding communities within its service area.

ALTERNATE CHANNEL PROPOSED - CHANNEL 287A

An alternate channel exists that would remove the conflict between the application of Gulfstar to upgrade Station KDAG and the proposed allotment of Channel 243A at Durango.

Channel 287A can be allotted to Durango, Colorado as an alternate channel to the proposed allotment of Channel 243A. Channel 287A can be allocated to Durango, Colorado without a site restriction.

As an aid in determining the suitability of the allotment of Channel 287A at Durango, an FM Channel Study (spacing study) was conducted at the following geographical coordinates (the city reference coordinates for Durango, Colorado):

37-16-29 N. Latitude

107-52-25 W. Longitude.

The results of the channel study are included herein as Table I. The study shows that the proposed allotment is clear of all existing stations or pending applications with the exception of the construction permit for station KRYD, Telluride, Colorado.

KRYD's construction permit is for Channel 285C1. However, the station has an application pending (BMP961220IC) to downgrade its facilities to operate as a Class C3 station on Channel 285C3. If KRYD's application is granted, the allocation of Channel 287A can proceed at the Durango reference point.

If KRYD's application is not granted or withdrawn, Channel 287A can be allocated to Durango with a minor site restriction of 1.4 kilometers to the south to avoid the short-spacing to KRYD as a Class C1 station at the following geographical coordinates:

37-15-44 N. Latitude

107-52-27 W. Longitude.

The results of the channel study at the above coordinates are included herein as Table II.

A suitable area to locate a station on Channel 287A exists. Two existing tower sites within the area to locate were studied as possible transmitter sites for a Class A station on Channel 287.

Site A is the licensed site for Station KRSJ, Durango, Colorado (Channel 263C1) and Site B, is the licensed site for Station KIQX, Durango, Colorado (Channel 267C1). A channel study was conducted from each site and the results are presented herein as Tables III and IV. Each site is within 3 kilometers of the reference point for Durango, Colorado and would provide the required city grade contour to Durango, Colorado.

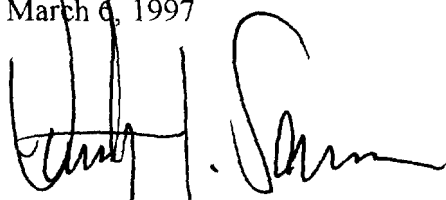
These possible sites for Channel 287A are fully-spaced from all other stations or applications of concern. A third site, the licensed site of Station KDUR, Durango, Colorado (Channel 220A) would also be available as a possible location once the application of KRYD to downgrade is granted.

SUMMARY

The allocation of Channel 287A is a suitable alternate channel for that of Channel 243A at Durango, Colorado. If channel 287A is allotted to Durango, the application of Gulfstar to improve the facilities of Station KDAG would no longer conflict with the proposed allotment of an additional FM channel at Durango, Colorado.

Further information, if required, concerning the technical merits or methods employed in the preparation of this narrative may be obtained by contacting the office of the undersigned.

March 6, 1997

A handwritten signature in black ink, appearing to read 'Timothy Z. Sawyer', written over a horizontal line.

Timothy Z. Sawyer

T.Z. Sawyer Technical Consultants
6204 Highland Drive
Chevy Chase, MD 20815
Tel.: (301) 913-9287
E-mail to: engineers@sawyer.com

T.Z. Sawyer
Technical Consultants
Chevy Chase, MD

FM SEPARATION STUDY

Job Title :ALTERNATE CHANNEL 287A (CITY REF PT) Separation Buffer 64 km
FCC DB Date : 02/21/97
Channel 287A (105.3 MHz) Coordinates : 37-16-29 107-52-25

| Call Status | City State | FCC File No. | Channel Freq. | ERP(kW) HAAT(m) | Latitude Longitude | Bearing deg-Tru | Dist. (km) | Req. (km) |
|--|---------------|--------------|------------------|--------------------|-----------------------|--------------------|---------------|--------------|
| KRYD | Telluride | | 285C3 | 11.0 | 37-55-59 | 2.8 | 73.16 | 42 |
| APP | CO | BMPH961220IC | 104.9 | -66.0 | 107-49-59 | | 31.16 | CLEAR |
| Downgrade application from Channel 285C1 | | | | | | | | |
| ¹ KRYD | Telluride | | 285C1 | 100. | 37-55-59 | 2.8 | 73.16 | 75 |
| CP | CO | BPH940527JB | 104.9 | -70.0 | 107-49-59 | | -1.84 | SHORT |
| *To Channel 285C3 per downgrade application 961220IC | | | | | | | | |
| KZRQ | Santa Fe | | 286C | 100. | 35-47-15 | 143.5 | 204.43 | 165 |
| LIC | NM | BLH850925KA | 105.1 | 590.0 | 106-31-35 | | 39.43 | CLEAR |
| KZKS | Rifle | | 287C | 60.0 | 39-25-57 | 354.8 | 240.56 | 226 |
| LIC | CO | BLH940928KB | 105.3 | 743.0 | 108-07-46 | | 14.56 | CLOSE |
| NEW | Grants | | 288C | 100. | 35-18-30 | 172.3 | 220.16 | 165 |
| APP | NM | BPH961118M5 | 105.5 | 310.0 | 107-32-48 | | 55.16 | CLEAR |
| values entered from application | | | | | | | | |
| KURA | Ouray | | 289C3 | 7. | 38-10-54 | 5.0 | 101.06 | 42 |
| LIC | CO | BLH950501KC | 105.7 | -7.0 | 107-46-25 | | 59.06 | CLEAR |

** End of separation study for channel 287A **

¹ Once the application of KRYD to downgrade to Class C3 is granted, this short-spacing will no longer exist.

Durango, Colorado

Table II

T.Z. Sawyer
Technical Consultants
Chevy Chase, MD

FM SEPARATION STUDY

Job Title :ALTERNATE CHANNEL 287A (SITE RESTRICTED) Separation Buffer 64 km

FCC DB Date : 02/21/97

Channel 287A (105.3 MHz)

Coordinates : 37-15-44 107-52-27

| Call Status | City State | FCC File No. | Channel Freq. | ERP(kW) HAAT(m) | Latitude Longitude | Bearing deg-Tru | Dist. (km) | Req. (km) |
|--|---------------|--------------|------------------|--------------------|-----------------------|--------------------|-------------------|--------------|
| KRYD | Telluride | | 285C3 | 11.0 | 37-55-59 | 2.8 | 74.55 | 42 |
| APP | CO | BMPH961220IC | 104.9 | -66.0 | 107-49-59 | | 32.55 | CLEAR |
| Downgrade application from Channel 285C1 | | | | | | | | |
| KRYD | Telluride | | 285C1 | 100. | 37-55-59 | 2.8 | 74.55 | 75 |
| CP | CO | BPH940527JB | 104.9 | -70.0 | 107-49-59 | | -.45 | |
| *To Channel 285C3 per downgrade application 961220IC | | | | | | | (ROUNDS TO 75 KM) | |
| KZRQ | Santa Fe | | 286C | 100. | 35-47-15 | 143.3 | 203.35 | 165 |
| LIC | NM | BLH850925KA | 105.1 | 590.0 | 106-31-35 | | 38.35 | CLEAR |
| KZKS | Rifle | | 287C | 60.0 | 39-25-57 | 354.8 | 241.93 | 226 |
| LIC | CO | BLH940928KB | 105.3 | 743.0 | 108-07-46 | | 15.93 | CLOSE |
| NEW | Grants | | 288C | 100. | 35-18-30 | 172.2 | 218.79 | 165 |
| APP | NM | BPH961118M5 | 105.5 | 310.0 | 107-32-48 | | 53.79 | CLEAR |
| values entered from application | | | | | | | | |
| KURA | Ouray | | 289C3 | 7. | 38-10-54 | 4.9 | 102.44 | 42 |
| LIC | CO | BLH950501KC | 105.7 | -7.0 | 107-46-25 | | 60.44 | CLEAR |

** End of separation study for channel 287A **

T.Z. Sawyer
Technical Consultants
Chevy Chase, MD

FM SEPARATION STUDY

Job Title :SITE A (KRSJ) Separation Buffer 64 km
FCC DB Date : 02/21/97
Channel 287A (105.3 MHz) Coordinates : 37-15-46 107-53-45

| Call Status | City State | FCC File No. | Channel Freq. | ERP(kW) HAAT(m) | Latitude Longitude | Bearing deg-Tru | Dist. (km) | Req. (km) |
|--|---------------|--------------|------------------|--------------------|-----------------------|--------------------|---------------|--------------|
| KRYD | Telluride | | 285C3 | 11.0 | 37-55-59 | 4.2 | 74.61 | 42 |
| APP | CO | BMPH961220IC | 104.9 | -66.0 | 107-49-59 | | 32.61 | CLEAR |
| Downgrade application from Channel 285C1 | | | | | | | | |
| KRYD | Telluride | | 285C1 | 100. | 37-55-59 | 4.2 | 74.61 | 75 |
| CP | CO | BPH940527JB | 104.9 | -70.0 | 107-49-59 | | -.39 | |
| *To Channel 285C3 per downgrade application 961220IC | | | | | | (ROUNDS TO 75 KM) | | |
| KZRQ | Santa Fe | | 286C | 100. | 35-47-15 | 142.9 | 204.56 | 165 |
| LIC | NM | BLH850925KA | 105.1 | 590.0 | 106-31-35 | | 39.56 | CLEAR |
| KZKS | Rifle | | 287C | 60.0 | 39-25-57 | 355.2 | 241.71 | 226 |
| LIC | CO | BLH940928KB | 105.3 | 743.0 | 108-07-46 | | 15.71 | CLOSE |
| NEW | Grants | | 288C | 100. | 35-18-30 | 171.7 | 219.13 | 165 |
| APP | NM | BPH961118M5 | 105.5 | 310.0 | 107-32-48 | | 54.13 | CLEAR |
| values entered from application | | | | | | | | |
| KURA | Ouray | | 289C3 | 7. | 38-10-54 | 6.0 | 102.56 | 42 |
| LIC | CO | BLH950501KC | 105.7 | -7.0 | 107-46-25 | | 60.56 | CLEAR |

** End of separation study for channel 287A **

Durango, Colorado

Table IV

T.Z. Sawyer
Technical Consultants
Chevy Chase, MD

FM SEPARATION STUDY

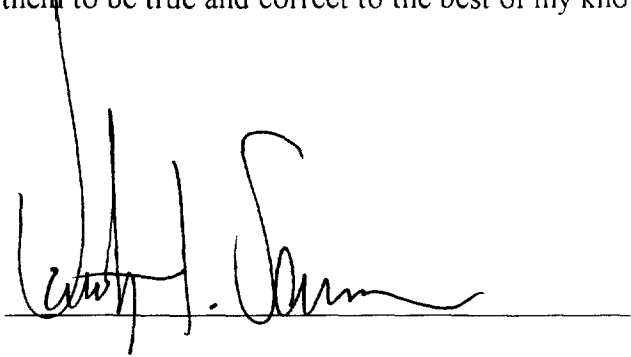
Job Title :SITE B (KIQX) Separation Buffer 64 km
FCC DB Date : 02/21/97
Channel 287A (105.3 MHz) Coordinates : 37-15-45 107-54-07

| Call Status | City State | FCC File No. | Channel Freq. | ERP(kW) HAAT(m) | Latitude Longitude | Bearing deg-Tru | Dist. (km) | Req. (km) |
|--|---------------|--------------|------------------|--------------------|-----------------------|--------------------|-------------------|--------------|
| KRYD | Telluride | | 285C3 | 11.0 | 37-55-59 | 4.6 | 74.68 | 42 |
| APP | CO | BMPH961220IC | 104.9 | -66.0 | 107-49-59 | | 32.68 | CLEAR |
| Downgrade application from Channel 285C1 | | | | | | | | |
| KRYD | Telluride | | 285C1 | 100. | 37-55-59 | 4.6 | 74.68 | 75 |
| CP | CO | BPH940527JB | 104.9 | -70.0 | 107-49-59 | | -.32 | |
| *To Channel 285C3 per downgrade application 961220IC | | | | | | | (ROUNDS TO 75 KM) | |
| KZRQ | Santa Fe | | 286C | 100. | 35-47-15 | 142.7 | 204.86 | 165 |
| LIC | NM | BLH850925KA | 105.1 | 590.0 | 106-31-35 | | 39.86 | CLEAR |
| KZKS | Rifle | | 287C | 60.0 | 39-25-57 | 355.4 | 241.69 | 226 |
| LIC | CO | BLH940928KB | 105.3 | 743.0 | 108-07-46 | | 15.69 | CLOSE |
| NEW | Grants | | 288C | 100. | 35-18-30 | 171.6 | 219.17 | 165 |
| APP | NM | BPH961118M5 | 105.5 | 310.0 | 107-32-48 | | 54.17 | CLEAR |
| values entered from application | | | | | | | | |
| KURA | Ouray | | 289C3 | 7. | 38-10-54 | 6.3 | 102.65 | 42 |
| LIC | CO | BLH950501KC | 105.7 | -7.0 | 107-46-25 | | 60.65 | CLEAR |

** End of separation study for channel 287A **

CERTIFICATION

I, Timothy Z. Sawyer, hereby state that I have prepared the foregoing technical narrative and its associated exhibits on behalf of Gulfstar Communications New Mexico Licensee, Inc. and that I believe them to be true and correct to the best of my knowledge and belief.

A handwritten signature in black ink, appearing to read 'Timothy Z. Sawyer', is written over a horizontal line.

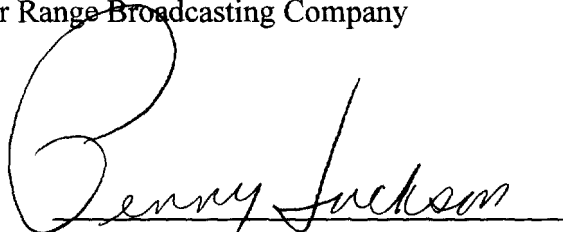
Timothy Z. Sawyer
March 6, 1997

T.Z. Sawyer Technical Consultants
6204 Highland Drive
Chevy Chase, Maryland 20815
Tel.: (301) 913-9287
Internet E-mail: tzsawyer@sawyer.com

Certificate of Service

I, Penny Jackson, a secretary with the law firm of Fisher Wayland Cooper Leader & Zaragoza L.L.P., hereby certify that a true copy of the foregoing Comments was served this 10th day of March, 1997, via First Class Mail, postage prepaid, on the following:

Henry E. Crawford, Esq.
Law Offices of Henry E. Crawford
1150 Connecticut Avenue, N.W.
Suite 900
Washington, D.C. 20036
Counsel for Range Broadcasting Company


Penny Jackson